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Proposed attorneys for debtor-in-possession Camperworld Business Trust

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

In re:

**CAMPERWORLD BUSINESS
TRUST,**

Debtor.

Bankruptcy Case No. 15-20383

Chapter 11

Honorable William T. Thurman

**SUPPLEMENTAL DECLARATION OF BENJAMIN J. KOTTER IN CONNECTION
WITH APPLICATION FOR EMPLOYMENT OF COHNE KINGHORN**

Benjamin J. Kotter, being of lawful age, declares, certifies, verifies and states as follows:

1. I make this verified statement pursuant to Rule 2014 of the Federal Rules of Bankruptcy Procedure in support of the *Debtor's Application for Authority to Employ Matthew M. Boley and the Law Firm Parsons Kinghorn Harris, P.C. as General Bankruptcy Counsel* [Docket No. 3] (the "Application") filed by Camperworld Business Trust, debtor and debtor-in-possession (the "Debtor").

2. I am a member in good standing of the State Bar of Utah. I am admitted to practice law in all of the State and Federal courts in the State of Utah. I am an attorney

associated with the law firm Cohne Kinghorn (“CK”), which is a professional law corporation headquartered in Salt Lake City, Utah. Parsons Kinghorn Harris P.C. and Cohne Rappaport & Segal, P.C. merged on February 17, 2015 and are now operating under the name “Cohne Kinghorn.”

3. Mathew M. Boley previously submitted the *Verified Statement of Matthew M. Boley in Support of Application for Employment of Parsons Kinghorn Harris* (see Docket No. 3) (the “Boley Declaration”) and this supplemental declaration supplements the information provided in the Boley Declaration.

4. At the time the Boley Declaration was filed, CK’s investigation was ongoing. *See* Boley Declaration, ¶3.

5. This supplemental declaration supplements Schedule 1 to the Boley Declaration as reflected on the Schedule 1 attached hereto and incorporated herein by reference.

6. Based upon the information obtained by me to date, I believe that neither I, nor any of the attorneys or employees of CK, has any connection or conflicts of interest with the bankruptcy estate, the Debtor, creditors, any other party in interest, their respective attorneys and accounts, the United States Trustee, or any person employed in the office of the United States Trustee, except as set forth in the Boley Declaration and as set forth herein.

7. Additionally, with the completion of the merger of Parsons Kinghorn Harris, P.C. and Cohne Rappaport & Segal, P.C., CK’s investigation is ongoing and CK will continue to review its conflicts database (now supplemented with information from Cohne Rappaport & Segal, P.C.) for any actual or potential conflicts and reserves the right to supplement and amend this declaration should it discover further pertinent relationships that require disclosure in this bankruptcy case.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 17th day of February, 2015.

PARSONS KINGHORN HARRIS

/s/ Benjamin J. Kotter
Benjamin J. Kotter

**SCHEDULE 1 TO SUPPLEMENTAL DECLARATION OF
BENJAMIN J. KOTTER IN CONNECTION WITH
APPLICATION FOR EMPLOYMENT OF COHNE KINGHORN**

The following persons are or may be creditors of the Debtor and/or parties against whom the Debtor may hold claims, and who are former clients of the firm (collectively, the “**Former Clients**”):

1. John Blake Taylor
2. Larry and Virginia Bowen
3. Joel and Susan Everts

The firm’s investigation revealed a number of former clients with names similar to creditors of the Debtor as listed below. Further investigation revealed that for those listed below their addresses were different than the creditors whose names were checked by CK and thus they do not appear to be creditors of the Debtor and/or parties against whom the Debtor may hold claims. Nevertheless, out of an abundance of caution, CK discloses the following persons who are former clients or persons affiliated with former clients of the firm who may be creditors of the Debtor and/or parties against whom the Debtor holds claims:

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| 4. Bruce Anderson | 27. Richard G. and Nancy Scott |
| 5. Robert Evans | 28. Howard King |
| 6. Bill and Lorraine Johnson | 29. Allan and Judy Smith |
| 7. Leon and Pamela Stewart | 30. Richard P. Johnson |
| 8. Richard and Nadine Jensen | 31. Michael and Colleen Chandler |
| 9. Jeff and Carla Harris | 32. Kim and Donna Peterson |
| 10. Rodney and Lori Clark | 33. Jimmie and Barbara Christensen |
| 11. Michael and Kim Brown | 34. Michael and Andrea Smith |
| 12. Michael and Theresa Brown | 35. Keith and Jean Christensen |
| 13. Richard and Sandra Cook | 36. Mark and Debra Nelson |
| 14. Doyle and Charlene Nelson | 37. David and Shauna Heddlesten |
| 15. John Owens | 38. Brandy Sturmer and Stacy Clayton |
| 16. Joseph and Tina Smith | 39. Lynn E. and Janice Anderson |
| 17. Lisa and Mark Gardner | 40. Ronald and Marie Hansen |
| 18. Robert Lee and Susan Follett | 41. Edwin and Kimberly Nelson |
| 19. Jimmy and Sheila Jones | 42. Bruce L. and Barbara Christensen |
| 20. Richard and Paula Smith | 43. Davie and Kay McKinley Harris |
| 21. Robert K. and Dona Peterson | 44. Sundie and Shaw Phillips |
| 22. Richard and Kathleen Evans | 45. Shaw Phillips |
| 23. Richard and Patricia Gordon | 46. Dennis and Gloria Johnson |
| 24. James M. and Trudy Adams | 47. Bradley and Kathleen Miller |
| 25. Scott and Raenell Parry | 48. James W. and Irene Lewis |
| 26. Richard and Ann Scott | 49. Karen Baker |

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| 50. | John and Sharon Taylor | 57. | Wynn and Annie Passey |
| 51. | Richard and Charlotte Hill | 58. | Paul A. Taylor |
| 52. | Bruce and Barbara Anderson | 59. | Chris and Linda Hunter |
| 53. | Robert and Barbara Wood II | 60. | James and Carol Hansen |
| 54. | Michael and Sheila Page Cox | 61. | Richard and Deborah Anderson |
| 55. | Michael and Nancy Runyan | 62. | Shaw Phillips |
| 56. | Terin and James Miller | | |

In any event, so far as I have been able to determine to date, CK represented these former clients in matters completely unrelated to the Debtor.

To date, my investigation has not revealed any current clients of the firm who are also creditors of the Debtor and/or parties against whom the Debtor holds a claim. CK has relationships with numerous clients, some of which may be or may have been creditors, equity holders or other parties in interest in this case. However, neither I nor CK will serve any party in a matter adverse to the Debtor in this case. Also, there may be unrelated matters in which CK has provided and will provide services in the future to various creditors or parties in interest in this case. In my opinion, these current and future representations, if any, do not and will not constitute materially adverse interests.

DATED this 17th day of February, 2015.

COHNE KINGHORN, P.C.

/s/ Benjamin J. Kotter

Benjamin J. Kotter